

From: [Michael Gadd](#)
To: [Kaytlin Beckett](#)
Cc: [Stejskal, Vernon \(USAUT\)](#); [Kent Burggraaf](#)
Subject: RE: US v. Shamo; final round of discovery ready for pick up
Date: Tuesday, April 23, 2019 10:56:00 AM

So are you thinking you'll be able to give us a copy of your exhibits from the computers by May 21 (four weeks from today)? And file your amended motion to exclude by May 21? If yes, we could try to respond by May 28th so the issues could be decided during the pre-admission hearing (May 29-31). If Judge Kimball is okay with it, we're okay with a compressed response time for that motion.

Could you send me your Expert Notice for Eric Wheeler by Friday (April 26th) so we can decide whether we want to challenge him under Rule 702 by the motion deadline (May 3rd)?

Thanks,
Mike

From: Kaytlin Beckett <kbeckett@schhlaw.com>
Sent: Tuesday, April 23, 2019 10:41 AM
To: Michael Gadd <mgadd@agutah.gov>
Subject: Re: US v. Shamo; final round of discovery ready for pick up

Mike,

I did not hear back from you on this, so we are going to file a motion with the Court. Asking for four weeks just on the computer forensic information. Hopefully, we get it done much sooner, but some of the images are encrypted and Eric is working with your tech folks to get that resolved.

Everything else will be filed this week.

Best,
Kaytlin Beckett

On Apr 16, 2019, at 9:18 PM, Kaytlin Beckett <kbeckett@schhlaw.com> wrote:

Yes. We were using Eide Bailly, but some issues came up and we had to find someone else.

Eric has only had the information for about two and half weeks now.

On Apr 16, 2019, at 9:11 PM, Michael Gadd <mgadd@agutah.gov> wrote:

Is your new computer expert Eric Wheeler?

I'll talk to the others tomorrow but I'm sure we can work something out.
Mike

From: Kaytlin Beckett <kbeckett@schhlaw.com>

Sent: Tuesday, April 16, 2019 11:38:21 AM

To: Michael Gadd

Subject: Re: US v. Shamo; final round of discovery ready for pick up

Mike,

I wanted to give you a heads up and I have a quick request. We were asked by the budgeting attorney to seek a new computer forensic expert back in February and only received the approval in the past few weeks. We are working diligently to get those reports and information necessary. I am going to list computer forensic reports on our exhibit list, but I will not have much more information than that until we receive them.

Along those same lines, one of the motions we previously filed dealt with authentication and online data issues from the dark web. We plan to refine a similar motion with more information from the current expert. Again, because of the delay in getting approval, we may not be able to get that motion filed by the court's requested deadline. Would you be willing to stipulate in an extension of time to file that particular motion in the event we are unable to get the reports and data from our expert in time?

Thanks again,
Kaytlin

On Apr 10, 2019, at 5:01 PM, Michael Gadd <mgadd@agutah.gov> wrote:

All,
Yvette has a disk for you at the USAO front desk that contains our last round of discovery in US v. Shamo. The disk contains records of some additional customers who have died from overdoses, lab notes from the chemists who performed tests on the drugs, some bank records, some controlled-substance-database records, a video of Bustin's post-arrest interview, a transcript of Ali Rose's interview, some business records certifications, some chain of custody documents, an updated spreadsheet showing Pharma-Master's feedback-linked sales, etc.

I suspect this disk won't be as useful to you as the items we're pulling together for next Wednesday. By the 17th,

when the exhibit lists are due, I hope to be able to provide you a copy of our (non-physical) exhibits—that way you don't have to go searching by bates number for pictures or documents on our exhibit list. It'll all be on a disk for you.

Respectfully,
Mike

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